Claim Rejections:

Claims 1-5 are all of the claims pending in the present application, and currently all of the claims remain rejected.

35 U.S.C. § 103(a) Rejection - Claims 1 and 3-5:

Claims 1 and 3-5 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,356,251 to Naito et al. (previously applied) in view of U.S. Patent No. 6,414,661 to Shen et al. In view of the following discussion, Applicant respectfully traverses the above rejection.

In an effort to cure the deficient teachings of Naito, with respect to the present invention, the Examiner is relying on the Shen reference. Specifically, the Examiner asserts that Shen teaches a "column driving circuit [which] controls a current flowing [into] data electrodes such that a current density of [a] light emitting element is maintained constant." *See* claim 1, and Office Action, pages 2-3. Applicant disagrees with the Examiner's assertions regarding the Shen reference and, in fact, Applicant submits that the Shen reference is no more relevant than the prior art discussed in pages 3-4, of the present application.

Specifically, Applicant notes that Shen expressly teaches away from using a constant current density and, in fact, teaches varying the applied current based on a number of factors. Applicant notes Shen states that:

> "Thus, even when driven by circuitry that compensates for I-V shifts over time to provide a substantially constant current to the OLED devices, *the display develops non uniformities over time* that are dependent on the amount of time and degree to which each pixel of the display has been driven." Col. 4, lines 55-60 (emphasis added).

Applicant notes that Shen further teaches that the development of these "non uniformities" is to be avoided. Stated differently, Shen teaches that to avoid the above "non-uniformities" the current applied to the pixels is constantly changed to compensate for any deterioration. Shen states that:

> "the current applied to each pixel to obtain a requested light output level, becomes a function not only of the requested pixel output signal, but also of the prior history of the pixel. The prior history is used to predict and compensate for change in the efficiency of each pixel based on prior pixel history, thereby obtaining a more uniform output" Shen, Col. 5, lines 48-56.

In view of the foregoing disclosure, Applicant submits that Shen expressly teaches away from the present invention, in that Shen teaches varying the current density rather than using a constant current density. Therefore, even if it were assumed that one of ordinary skill in the art would combine the teachings of Naito with Shen, the resultant combination would fail to teach or suggest each and every feature of the present invention. This is because by incorporating Shen, one of ordinary skill in the art would employ the Shen system which varies the current, as a function of the requested pixel output signal and the prior history of the pixel. This is not the present invention.

Further, Applicant notes that because Shen constantly varies the current density, the Shen system suffers from the same drawbacks discussed on page 3 of the present application. Namely, the use of the system to control and vary the current for each pixel would increase the complexity and cost of the overall system. Because of this, Applicant submits that one of ordinary skill in the art would not be motivated to combine the teachings of Naito with Shen.

In view of the foregoing, Applicant submits that (1) there is no motivation or suggestion to combine the Naito and Shen references as suggested by the Examiner, and (2) that even if Naito and Shen were combined, the resultant combination would fail to teach or suggest each and every feature of the claimed invention, as set forth in claim 1. Therefore, Applicant submits that the Examiner has failed to establish a *prima facie* case of obviousness, and hereby requests the Examiner reconsider and withdraw the above 35 U.S.C. § 103(a) rejection of this claim. Further, as claims 3-5 depend on claim 1, Applicant submits that these claims are also allowable, at least by reason of their dependence.

35 U.S.C. § 103(a) Rejection - Claim 2:

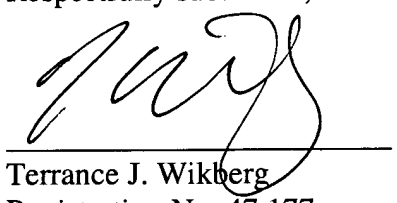
Claim 2 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Naito in view of Shen, in further view of U.S. Patent No. 5,754,160 to Shimizu. However, because claim 2 depends on claim 1, and because Shimizu fails to cure the deficient teachings of the Naito and Shen references, Applicant submits that claim 2 is allowable, at least by reason of its dependence.

Conclusion:

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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